# **Anti-Slavery Policy Statement**

Issue Number 1

Release Date:

26 September, 2023



This policy reflects the commitment of Inventis Limited and its Subsidiaries ("the Group") to ensure there is no slavery, as defined in the Modern Slavery Act 2018 (Cth) ("the Act") in any part of our business operations. We are committed to acting ethically and with integrity in all business dealings and relationships, and to ensuring that modern slavery is not taking place in our own business or supply chain.

As part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Our business also expects its service providers, suppliers, and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

#### **Definitions**

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats, and deception can be explicit or implicit.

The Act defines modern slavery as including eight types of serious exploitation; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work.

Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.

## **Application of Policy**

Even though the Group is not obligated to comply with the Act, it has decided to adopt the fundamental principles of the legislation through the effective design, implementation and review of management systems to identify the risk of slavery within the business supply chain. Management have identified that this can best be achieved by;

- 1. A Robust Procurement Policy including but not limited to;
  - a. Supplier assessment processes,
  - b. Supplier Code of Conduct, and
  - c. Supplier questionnaires focused on modern slavery/signals. Deployed on a risk basis, according to the Geographical location from which the products/services are provided.
- 2. An appropriately designed and implemented Vendor Management Programme,
- 3. Ensuring that the Group conducts business consistent with the highest ethical and professional standards in line with its Code of Conduct and Ethics,



- 4. Ensuring that its employees and business partners report any concerns, including those relating to modern slavery or human trafficking, and
- 5. Providing ongoing and regular training to staff.

### **Monitoring and Review**

The Board will monitor the content, effectiveness, and implementation of this Policy on a regular basis. There may also be independent reviews taken from time to time. Any findings, updates or improvements identified will be addressed as soon as possible.

## **Relationship to other Policies**

This Policy should be read in conjunction with the following Inventis policies:

- Code of Conduct and Ethics,
- Whistleblower Policy, and
- Anti-Bribery and Anti-Corruption Policy

#### Approved by the Board

Date for next review of this policy: September 2025